## REMARKS

Claims 1, 13, and 15 - 18 have been cancelled herein from the application without prejudice. Claims 3 - 12 have been amended. Claims 19 - 26 have been added. No new matter has been introduced with these amendments or added claims, which are supported in the specification as originally filed. Claims 2 - 12 and 19 - 26 are now in the application.

## 1. Rejection under 35 U.S.C. §102

Page 2 of the Office Action dated June 21, 2005 (hereinafter, "the Office Action") states that Claims 1, 3 - 13, and 15 - 18 are rejected under 35 U.S.C. §102(b) as being anticipated by Barkley et al. (U.S. 6,202,066). Claims 1, 13, and 15 - 18 have been cancelled from the application without prejudice, rendering the rejection moot as to those claims, and Claims 3 - 12 are deemed patentable over Barkley in view of the novelty of the independent claims from which they depend, as will now be discussed.

Applicants have provided new independent Claims 19, 23, and 25 to more clearly specify limitations of their claimed invention, and respectfully submit that Barkley fails to teach these limitations.

The first limitation of Applicants' independent Claim 19 specifies "storing, in a security repository, a plurality of security objects, wherein each of the security objects corresponds to a single role" (see Claim 19, lines 3 - 4, emphasis added). Claims 23 and 25 are similar. Barkley

Serial No. 09/943,618

-9-

## does not teach:

- (1) storing security objects in a security repository

  Instead, Barkley simply states that his Object Access Types ("OATs") are stored separately from the objects to which they pertain. See, for example, the following citations:
  - ♦ col. 4, lines 56 59, "The OATS are then manipulated as an entity separate from the objects ... with which they may be associated."; and

FAX

- ♦ col. 7, lines 32 35, "The OATs can be manipulated as independent entities separate from the objects with which they are associated".
- (2) security objects that each correspond to a <u>single</u> role

  Instead, Barkley teaches that his OATs may specify information for <u>more than one</u>
  role. See, for example, the following citations:
  - ◆ col. 5, lines 5 14, describing a scenario where "members of a <u>first role</u> are given a first level of access or permissions to a first set of files or objects, while those designated to a <u>second role</u> are granted a different second level of access to the <u>same set</u> of files. <u>An OAT</u> [note, singular: <u>one</u> OAT] is then created ... [with both sets of permissions] <u>The OAT</u> [again, note singular: <u>one</u> OAT] is then assigned ..." (emphasis added);
  - ♦ col. 7, lines 4 5, referring to a "<u>list</u> of roles or groups" (emphasis added) that can be associated with an object via a 3-tuple used for specifying Barkley's OATs;
  - col. 9, lines 2 3, stating that a role can be <u>removed from</u> an OAT (which, by implication, indicates that the OAT contained <u>more than one</u> role);
  - ♦ col. 12, lines 42 45, "... all of the objects assigned to a given OAT may be

accessed identically by members of <u>each of the roles</u> assigned to that OAT ..."

(emphasis added); and

◆ Table I, where each of the columns represents a single OAT and each of the rows identifies a plurality of roles that may be represented in the OAT. The OAT for "accounts", for example, represents 4 of the 5 roles from the table (i.e., all except "employee"), as described in the corresponding text at col. 11, line 63 - col. 12, line 32.

Accordingly, it can be seen that Barkley does not teach this first limitation of independent Claims 19, 23, and 25.

The second limitation of Applicants' independent Claim 19 is "specifying, in each of the security objects, all permissions granted to the corresponding role, wherein each of the specified permissions identifies at least one resource and, for each resource, at least one action that can be performed on the resource by subjects granted the corresponding role, wherein selected ones of the resources are identified in the specified permissions of more than one of the security objects and wherein the specified permissions for at least one of the security objects identifies a plurality of resources and for each of the plurality of resources, at least one of the actions". Claims 23 and 25 are similar. Barkley does <u>not</u> teach:

(1) specifying, in each of the security objects, <u>all</u> permissions granted to the corresponding <u>role</u>

Instead, Barkley teaches that permissions for a particular role can be split across

Serial No. 09/943,618

-11-

multiple OATs. See, for example, the following citations:

- ♦ col. 7, lines 53 55, stating "changes in the permissions granted to a particular role can be implemented simply by changing ... the corresponding OATs" (note, plural use of OATs); and
- ♦ col. 12, lines 46 49, stating "... the members of a given role may be assigned differing permissions ... by being assigned membership in differing OATs"
  (emphasis added).
- (2) wherein the specified permissions for at least one of the security objects identifies a plurality of resources and for each of the plurality of resources, at least one of the actions

  Instead, Barkley teaches use of tuples that, for a particular role, specify a single object or resource (and a plurality of actions thereupon). See, for example, the following citations:
  - ♦ col. 6, lines 61 62, stating "This association can be represented as a 3-tuple: (role or group; object [note, singular]; {permitted operations on object [note, singular]}"
  - ♦ col. 6, lines 63 65, stating "... a user assigned to role ... is authorized to perform operation [note, singular] on object ..."; and
  - ♦ col. 6, line 66 col. 7, line 3, stating that an "isomorphic" representation of the 3tuple is a form where the role/group and object entries are reversed (again, using "object" in the singular)
  - ♦ col. 7, lines 4 6, discussing the isomorphic representation, stating that "for each object", the 3-tuple specifying that object provides a list of roles or groups for the

object

Accordingly, it can be seen that Barkley does not teach this second limitation of independent Claims 19, 23, and 25.

Because Barkley fails to teach limitations of their independent Claims 19, 23, and 25, Applicants respectfully submit that these claims are patentable over Barkley as currently presented. Dependent Claims 3 - 12, 20 - 22, 24, and 26 are therefore deemed allowable over Barkley by virtue of the novelty of the independent claims. The Examiner is therefore respectfully requested to withdraw the §102 rejection.

## II. Conclusion

Applicants respectfully request reconsideration of the pending rejected claims, withdrawal of all presently outstanding rejections, and allowance of all remaining claims at an early date.

Respectfully submitted,

Marcia L. Doubet

Attorney for Applicants

Reg. No. 40,999

Customer Number for Correspondence: 43168

Phone: 407-343-7586 Fax: 407-343-7587

Serial No. 09/943,618

-13-